

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

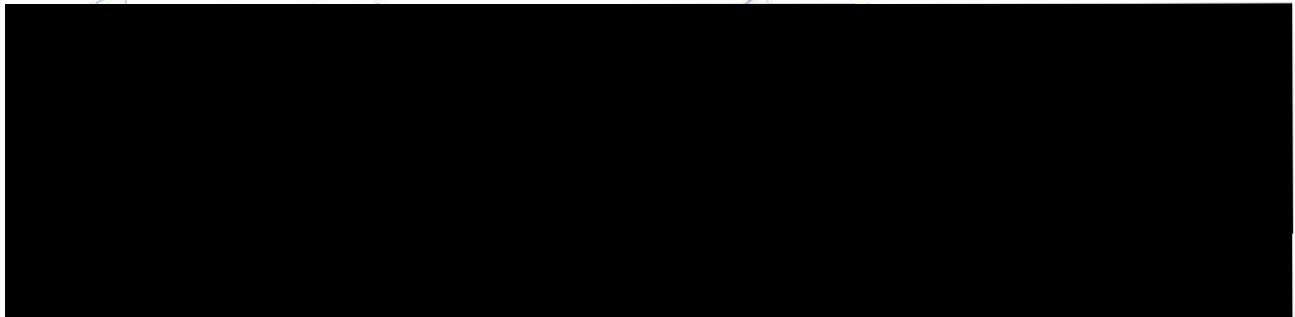
DAWN LEEANN BROWN : Case No. 1:18-CV-00785
and :
TARA BROWN, : (Judge Michael Barrett)
Plaintiffs :
v. : JURY INTERROGATORIES RELATIVE
TO PLAINTIFF, TARA BROWN
ABUBAKAR ATIQ DURRANI, M.D., :
Defendant :

INTERROGATORY NUMBER 1

Was Defendant, Abubakar Atiq Durrani, M.D., negligent in the care and treatment of Plaintiff, Tara Brown?

Yes X

No _____



* If your answer to this Interrogatory is Yes, please proceed to Interrogatory Number 2.

* If your answer to this Interrogatory is No, do not answer the remaining Interrogatories relative to Plaintiff, Tara Brown; please proceed to Verdict Form relative to Plaintiff, Tara

Brown, in favor of Defendant, Abubakar Atiq Durrani, complete it, and enter a verdict in favor of Defendant, Abubakar Atiq Durrani, M.D.

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INTERROGATORY NUMBER 2

If your answer to Interrogatory Number 1 was Yes, answer this question and then proceed to Interrogatory Number 3.

Please indicate in what respects Defendant, Abubakar Atiq Durrani, M.D., was negligent.

Overstated radiological findings: Yes X No _____

Fabricated diagnosis: Yes X No _____

Misdiagnosis: Yes X No _____

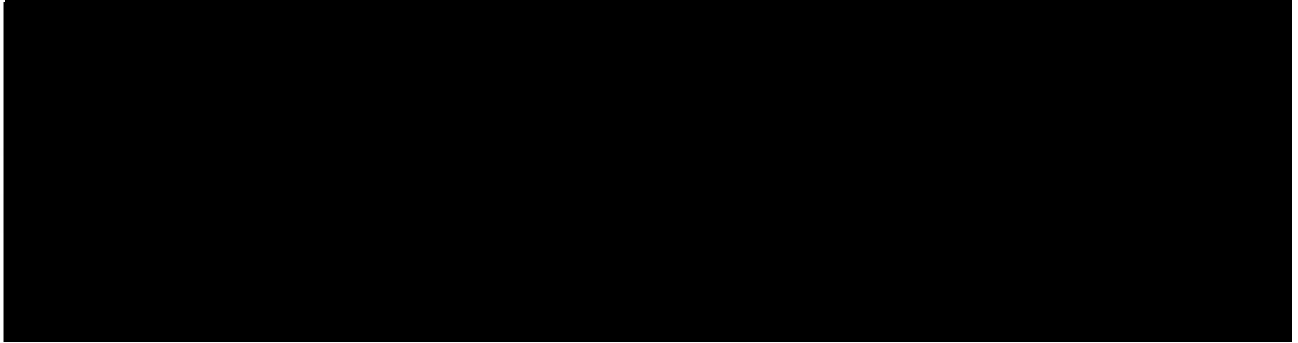
Unnecessary surgery: Yes X No _____

Failure to prescribe
course of conservative care: Yes _____ No X

Selecting improper surgical procedure: Yes X No _____

Improper placement of surgical hardware: Yes X No

Lack of informed consent: Yes X No



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TO PLAINTIFF, TARA BROWN

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ABUBAKAR ATIQ DURRANI, M.D.,

:

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Defendant

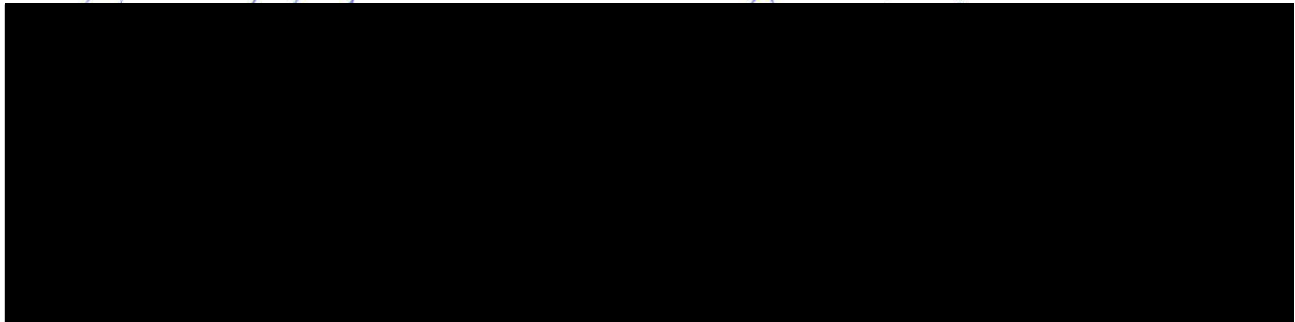
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INTERROGATORY NUMBER 3

If your answer to Interrogatory Number 1 is Yes, please state whether Defendant, Abubakar Atiq Durrani, M.D.'s, negligence directly and proximately caused injury to Tara Brown?

Yes X

No



* If your answer to this Interrogatory is Yes, please proceed to Interrogatory Number

4.

* If your answer to this Interrogatory is No, do not answer the remaining Interrogatories; please proceed to the Verdict Form relative to Plaintiff, Tara Brown, in favor of Defendant, Abubakar Atiq Durrani, M.D., complete it and enter a verdict in favor of Defendant, Abubakar Atiq Durrani, M.D.

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TARA BROWN,	:	(Judge Michael Barrett)
	:	
Plaintiffs	:	
	:	
v.	:	JURY INTERROGATORIES RELATIVE TO PLAINTIFF, TARA BROWN
	:	
	:	
ABUBAKAR ATIQ DURRANI, M.D.,	:	
	:	
	:	
Defendant	:	

INTERROGATORY NUMBER 4

If your answers to Interrogatory Numbers 1 and 3 is Yes, please state what you find to be the total amount of damages, if any, sustained by Plaintiff, Tara Brown, for each element of damages set forth below:

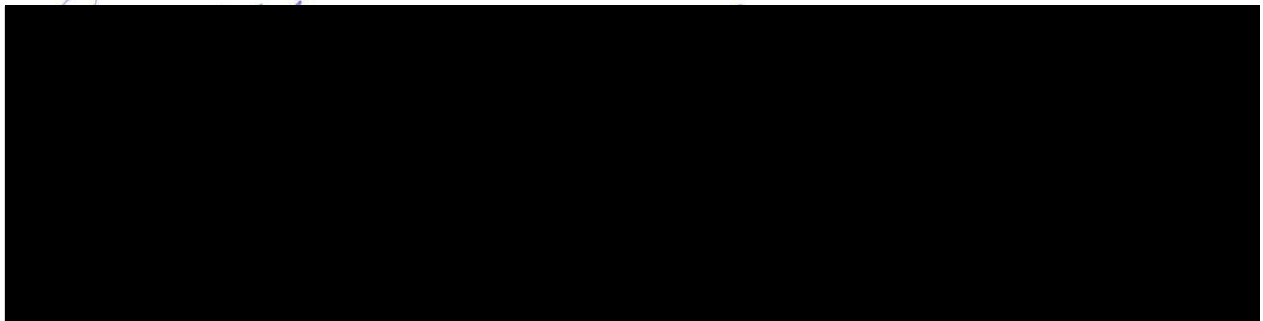
A. Economic Damages

1. Past medical expenses	\$	<u>300.00</u>
2. Future medical/care expenses	\$	<u>50,000.00</u>
Total Economic Damages	\$	<u>50,300.00</u>

B. Non-Economic Damages

1. Past Pain and Suffering	\$ <u>325,000.00</u>
2. Future Pain and Suffering	\$ <u>325,000.00</u>
3. Past Loss of Enjoyment of Life	\$ <u>325,000.00</u>
4. Future Loss of Enjoyment of Life	\$ <u>325,000.00</u>
Total Non-Economic Damages	\$ <u>1,300,000.00</u>

Total (the Sum of Economic and Noneconomic Damages)	\$ <u>1,350,300.00</u>
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Please proceed to Interrogatory Number 5.

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Plaintiffs

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v.

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:

ABUBAKAR ATIQ DURRANI, M.D.,

:

:

Defendant

:

INTERROGATORY NUMBER 5

Is any of non-economic loss found in Interrogatory Number 4 the result of permanent and substantial physical deformity, loss of use of a limb, or loss of a bodily organ system?

Yes X

No

Is any of non-economic loss found in Interrogatory Number 4 the result of physical functional injury that permanently prevents Plaintiff from being able to independently care for himself and perform life-sustaining activities?

Yes _____

No X



Please proceed to Interrogatory Number 6.

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	:	
Plaintiffs	:	
	:	JURY INTERROGATORIES RELATIVE TO PLAINTIFF, TARA BROWN
v.	:	
	:	
ABUBAKAR ATIQ DURRANI, M.D.,	:	
	:	
Defendant	:	

INTERROGATORY NUMBER 6

If you answered Yes to Interrogatory Numbers 1 and 3 and have awarded compensatory damages, you may consider punitive damages, as defined in these instructions.

If you award punitive damages, it should be presumed that Plaintiff has been made whole for his or her injuries by the award of compensatory damages. In determining the amount of punitive damages, you may consider all of the following:

- (A) the harm caused was physical as opposed to economic;
- (B) the tortious conduct evinced an indifference or a reckless disregard of the health or safety of others;
- (C) the target of the conduct had financial vulnerability;

(D) the conduct involved repeated actions or was an isolated incident; and

(E) the harm was a result of intentional malice, trickery or deceit, or mere accident. The amount you award should be fair and reasonable and should not be influenced by passion or prejudice.

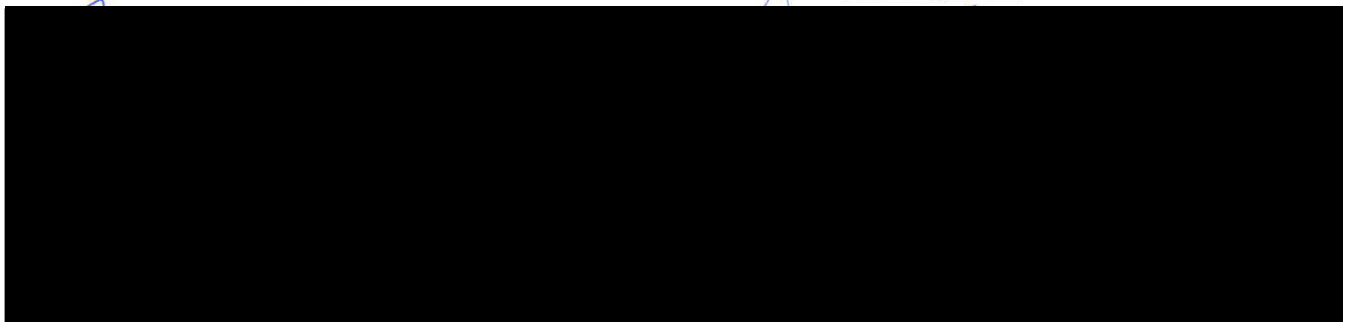
If you decide that Defendant, Abubakar Atiq Durrani, M.D., is liable for punitive damages, you must also decide whether Defendant is liable for the reasonable attorney fees of counsel employed by Plaintiff in the prosecution of this action.

If you decide that Defendant, Abubakar Atiq Durrani, M.D., is liable for attorney fees, the Court will determine the amount.

If your answer to Interrogatory Numbers 1 and 3 is Yes and you awarded compensatory damages, please state whether Plaintiff, Tara Brown, is entitled to an award of punitive damages?

Yes X

No _____

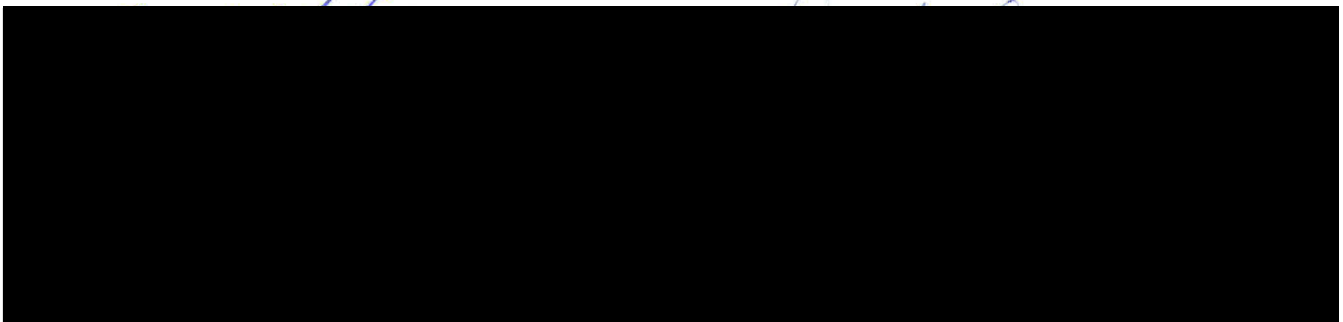


Punitive Damage Amount \$ 5,500,000.00

If you decided that Defendant is liable for punitive damages, please state whether Plaintiff, Tara Brown, is entitled to an award of attorney fees.

Yes X

No _____



After you complete this Interrogatory, proceed to the Verdict Form relative to Plaintiff, Tara Brown, and verdict in favor of Plaintiff, Tara Brown, complete it and enter a verdict in favor of Plaintiff, Tara Brown.

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and

:

TARA BROWN,

: (Judge Michael Barrett)

:

Plaintiffs

:

: VERDICT FORM RELATIVE TO
PLAINTIFF, TARA BROWN

v.

:

: VERDICT IN FAVOR OF PLAINTIFF,
TARA BROWN

ABUBAKAR ATIQ DURRANI, M.D.,

:

Defendant

VERDICT FOR PLAINTIFF, TARA BROWN

We, the Jury, being duly empanelled, do hereby find that Defendant, Abubakar Atiq Durrani, M.D.'s, negligence directly and proximately caused injury to Plaintiff, Tara Brown. We therefore find in favor of Plaintiff, Tara Brown, and against Defendant, in the amount of \$ 6,850,300.00.

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	:	
Plaintiffs	:	
	:	VERDICT FORM RELATIVE TO
	:	PLAINTIFF, TARA BROWN
v.	:	
	:	VERDICT IN FAVOR OF DEFENDANT
	:	
ABUBAKAR ATIQ DURRANI, M.D.,	:	
	:	
Defendant	:	

VERDICT FOR DEFENDANT, ABUBAKAR ATIQ DURRANI, M.D.

We, the Jury, being duly empanelled, do hereby find for Defendant, Abubakar Atiq Durrani, M.D., and against Plaintiff, Tara Brown.
